

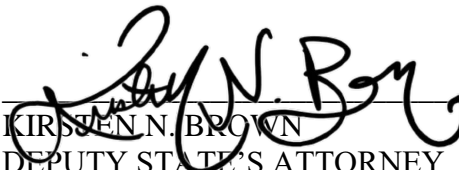
STATE OF MARYLAND * CRIMINAL NO. D-111-CR-23-000068
v * IN THE DISTRICT COURT FOR
SHAUN PORTER * FREDERICK COUNTY, MARYLAND

STATE'S PETITION FOR APPOINTMENT OF A SPECIAL PROSECUTOR

COMES NOW, the State of Maryland, by and through Kirsten N. Brown, Deputy State's Attorney for Frederick County, Maryland, and pursuant to Courts and Judicial Proceedings §2-102, petitions this Honorable Court to appoint a Special Prosecutor for reasons as follows:

1. The Defendant in the above captioned case is alleged to be involved in two corresponding cases pertaining to a different Defendant that was previously employed by and has a current working relationship with the State's Attorney Office for Frederick County, Maryland.
2. That on June 22, 2023, the Defendant was charged with: **HARASS; A COURSE OF CONDUCT – 5 Counts;** and **STALKING** alleged to have occurred on or about June 7, 2023 through June 22, 2023.
3. That the Complainant in the above captioned case is the same as in State v John Discavage, Case Nos. D-111CR-23-000944 and D-111-CR-23-001297, and has indicated these cases may be related. Those cases are being handled by the Howard County State's Attorney's Office.
4. That due to the above information, this creates the potential for a conflict of interest.
5. That, based upon the aforementioned conflict, the Deputy State's Attorney for Frederick County, Maryland, Kirsten N. Brown, is requesting the appointment of Natasha C. Blount, Assistant State's Attorney, for Howard County, Maryland, CPF #1106150028, as the Special Prosecutor in this case.

WHEREFORE, Petitioner respectfully requests that this Honorable court sign the attached Order appointing a Special Prosecutor as requested.



KIRSTEN N. BROWN
DEPUTY STATE'S ATTORNEY
CPF No. 9712160154
100 West Patrick Street
Frederick, Maryland 21701
Ph. (301) 600-1523 / Fax No. (301) 600-2195
FrederickSAOCircuit@frederickcountymd.gov

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 3rd day of July, 2023, a copy of the foregoing State's Petition for Appointment of a Special Prosecutor was sent via MDEC and/or Sharefile, a secure file sharing service to the designated e-mail address and/or service contact for Natasha Blount, Assistant State's Attorney, for Howard County, Maryland, 9250 Judicial Way, Ellicott City, MD 21043, and to Shaun Porter, 20033 Cool Hollow Road, Hagerstown, MD 21740-0000, the Defendant herein.



KIRSTEN N. BROWN
DEPUTY STATE'S ATTORNEY
CPF No. 9712160154
100 West Patrick Street
Frederick, Maryland 21701
Ph. (301) 600-1523 / Fax No. (301) 600-2195
FrederickSAOCircuit@frederickcountymd.gov